



Setting Standards for Excellence

TIMOTHY FELDMAN

Vice President, Government Affairs

October 1, 2003

Honorable Robert Pernell
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Dear Commissioner Pernell:

Please accept the following comments on behalf of the NEMA Luminaire Section's Outdoor Lighting Task Force regarding the development of outdoor lighting standards under the auspices of Title 24.

Along with various other safety features, quality outdoor lighting is a key component to the safety of Californians, and to the security of their public and private property. However, under the proposed regulations, the proposed lighting power density criteria for parking lots, among other areas, would jeopardize this very sense of safety. The CEC proposed regulations are not consistent with lighting security guidelines published by the Illuminating Engineering Society of North America (IESNA).

The proposed CEC *maximum* illumination levels for heavily traveled retail parking lots is only half of the recommended *minimum* level as proposed by the IESNA. As a result, deleterious consequences such as increased crime, accidents and other problems could occur as a result of lesser lighting. We urge your prompt and thorough reconsideration of these numbers.

The proposed CEC regulations also contemplate what are commonly known as lighting zones: allowable illumination in a given area. Existing, peer reviewed lighting zone categories have been established by internationally recognized professional lighting bodies. The NEMA Task Force strongly recommends maintaining these lighting zone classifications without modification.

The CEC proposes to eliminate a one-fourth of the available lighting zones available in California. Of the four major zones, which run the gamut from rural to significantly

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brighter urban centers, the CEC assumes that the fourth level is not necessary and proposes to squeeze California into three limited categories. If the recommended fourth category is ever necessary (California already has thousands), a locality seeking to increase its illumination level will have to engage in an untested and possibly lengthy petition process for a particular zone change. The proposed petition process should be eliminated and the recognized and existing zone concept should be embraced.

The NEMA Luminaire Outdoor Lighting Task Force has been consistently engaged in all aspects of the CEC outdoor lighting rulemaking process for the past three years. NEMA Luminaire manufacturers will continue to serve as a resource to the CEC, and will continue to raise important issues with regard to the rulemaking.

Thank you in advance for the consideration and attention to the views of the NEMA Luminaire manufacturers. If you have further questions, comments or concerns, please do not hesitate to contact me or Douglas Troutman of my staff on (703) 841-3245.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Feldman", with a stylized, flowing script.

Timothy Feldman